

EXHIBIT A

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RASIER, LLC; and RASIER-CA, LLC

14 [Additional Counsel Listed on Signature Page]

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 **SAN FRANCISCO DIVISION**

19 IN RE: UBER TECHNOLOGIES, INC.,
20 PASSENGER SEXUAL ASSAULT
21 LITIGATION

Case No. 3:23-md-03084-CRB

22 This Document Relates to:
23 ALL ACTIONS

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DECLARATION OF SCOTT BINNINGS
IN SUPPORT OF DEFENDANTS'
MARCH 17, 2025 BRIEF PURSUANT TO
SPECIAL MASTER ORDER NO. 2, § III(6)

DECLARATION OF SCOTT BINNINGS

I, Scott Binnings, having personal knowledge of the following state:

1. I am the Associate General Counsel, Safety and Core Services, at Uber. I was first
2 employed by Uber in April 2015 and have worked as in-house legal counsel for the past 9 years. My
3 previous positions included Senior Counsel, Regulatory; Senior Counsel, Safety; Legal Director,
4 Safety; Senior Legal Director, Safety; and Senior Legal Director, Safety, Payments, and Risk. In my
5 current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal
6 advice to Uber's leadership and employees related to safety issues, procedures, and policy, among
7 other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants
8 Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's March 17, 2025 brief pursuant to Special
9 Master Order No. 2, § III(6) (ECF 2357). The facts set forth herein are true and correct and are based
10 on my own personal knowledge, and I could and would competently testify thereto if called.

2. I reviewed the document identified on the privilege log as
3 JCCP_MDL_PRIVLOG054651. It is a Google Docs comment notification email dated January 24,
4 2018 sent to then-Head of Global Safety Communications Brooke Anderson regarding a comment
5 from then-Safety Communications, Sr. Manager, Tracey Breeden. The email notification was
6 generated from a Google document concerning Uber's background check policies. The comment
7 reflected in the email repeats verbatim the legal advice that then-Senior Counsel, Regulatory, Lisa Tse
8 and I provided in the underlying document identified on the privilege log as
9 JCCP_MDL_PRIVLOG006209.

I declare under penalty of perjury that the foregoing is true and correct.

25 Executed in San Anselmo, California on March 17, 2025.

By: S. Binnings

26 Scott Binnings